Commissioners,

I am writing in regard to the inquiry concerning carrier current systems, including broadband over power line systems (BPL). Initial calculations based on available data show that these proposed broadband services would be detrimental to reception in the HF frequency spectrum used not only by the amateur radio service, but also by maritime and aeronautical mobile stations, defense agencies, as well as other short wave broadcast stations.

This system could represent at best a hindrance of typical HF communications by present users who already comply with FCC Part 15 rules, and at worst a threat to homeland security due to the adverse affects on the U.S. Navy, Army, and Air Force—very important users of the HF spectrum.

Data taken from actual field measurements in Japan where this system was briefly tested, revealed that noise made entire bands of the HF spectrum virtually useless.

It is imperative that any and all changes made to Part 15 of the Commission's rules, (particularly with respect to developing measurement standards for the systems in question) keep in place critical interference safe-guards of preceding spectrum users, including the amateur service.

While high-speed internet services, including BPL, are certainly worthy of investigation, the gains of rural delivery of broadband services at the expense of vital HF communications between amateur radio operators during natural and man-made disasters such as those that occurred on September 11, 2001 are not tolerable. Finally, "last mile" delivery of broadband services has already been assured through high-speed satellite internet connections currently available at competitive prices.

Recent provisions by the Commission (referenced in Section 10 of Part III of the Notice of Inquiry) to unlicensed users differ from the case at hand, in that none of the provisions were detrimental to such large ranges of frequency. In addition, these frequencies have the unique characteristic of being propagated with relatively high efficiency over great distances, as opposed to the intrinsic characteristics of the higher VHF, UHF, and microwave bands. While the Commission should be encouraged to facilitate the introduction of new technologies when possible, it should not do so at the cost of the amateur radio service or military RF applications, both vital homeland security resources.

Thank you for your time in considering these facts on this important issue.

Sincerely,

Jason A. Dugas